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January 13, 1995

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Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

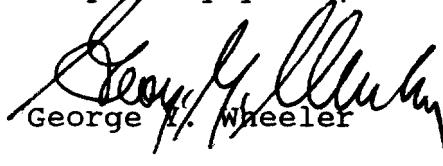
Re: PP Docket No. 93-253
GEN Docket No. 90-314, ET Docket No. 92-100

Dear Mr. Caton:

Transmitted herewith, on behalf of American Paging, Inc., are an original and four copies of its comments in response to the Commission's request for "Additional Comment" (DA 94-1560) dated December 21, 1994 in the above-captioned proceedings.

In the event there are any questions concerning this matter, please communicate with the undersigned.

Very truly yours,


George Y. Wheeler

Enclosure

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

JAN 13 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Implementation of Section 309(j))
of the Communications Act)
)
Competitive Bidding)
)
and)
)
Amendment of the Commission's)
Rules to Establish New Narrowband)
Personal Communications Services)

PP Docket No. 93-253

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GEN Docket No. 90-314
ET Docket No. 92-100

To: THE COMMISSION

COMMENTS OF
AMERICAN PAGING, INC.

American Paging, Inc., on behalf of itself and its subsidiaries (collectively "API"), by its attorneys, files its comments in response to the Commission's request for "Additional Comment" by Public Notice (DA 94-1560) dated December 21, 1994 in the above-captioned proceedings.

1. In our comments filed September 16, 1994 in the above-captioned proceedings, we requested that the Commission expand the number of channel blocks for narrowband PCS service by channelizing the additional one megahertz of spectrum already allocated for this service.¹ This will increase opportunities for licensing by minorities, women and small businesses, provide expanded

¹ See the Commission's First Report and Order in GEN Docket No 90-314, ET Docket No 92-100 released July 23, 1993, ¶ 19, in which the Commission specifically confirms that all three megahertz are allocated for narrowband PCS and that it has the flexibility to channelize and license the remaining one megahertz of spectrum for expanded narrowband PCS licensing opportunities.

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opportunities for the numerous companies already in the paging industry to implement advanced technologies and encourage competition.

With a possible schedule for narrowband PCS auctions more than six months from now (i.e., after the broadband PCS C, D, E and F auctions), we urge the Commission promptly to initiate proceedings to channelize this remaining one megahertz of reserved spectrum so that some or all of it can be auctioned, if appropriate, with narrowband channel blocks 18 through 26 and the existing MTA/BTA response channels. By expanding the number of channel blocks involved, this approach will give the Commission added flexibility in designing service specific auction rules to accommodate the needs of designated entities and other bidders.

2. The fact that designated entity bidders were able to aggregate co-channel licenses to create nationwide systems and large multi-regional systems confirms the effectiveness of spectrum auctions as a means of giving bidders options to pursue business plans involving a variety of service area sizes. Spectrum auctions by design preserve the options of some bidders to pursue aggregation strategies and at the same time offer the opportunities of numerous other bidders who are not interested in service areas larger than a single MTA. We believe that the rights of all bidders can be protected fairly if the Commission uses MTA licensing exclusively for its auctions covering channel blocks 18

through 26 and for all unpaired response channels.²

As discussed here, we request that the Commission act promptly to channelize and auction the one megahertz of reserved narrowband PCS spectrum to supplement channel blocks 18 through 26 and the unpaired response channels. The channel blocks currently channelized for BTA licensing should be redesignated as MTA licenses.

Respectfully submitted,

AMERICAN PAGING, INC.

BY


George Y. Wheeler

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Its Attorneys

January 13, 1995

² We believe that the smallest geographic unit for narrowband PCS licensing should be MTA areas. Implementation of narrowband PCS systems on a BTA basis is impractical.